

# EXHIBIT 1

**EXPERT REPORT**

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**ERIK LAYKIN**

**October 22, 2024**

**IN THE UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

ADSTRA, LLC,  
Plaintiff,

vs.

KINESSO, LLC and ACXIOM, LLC,  
Defendants

Civil Action No. 24-CV-02639

1 [REDACTED]

2 [REDACTED]

3 [REDACTED]

4 [REDACTED]

5 [REDACTED]

6 [REDACTED]

7 [REDACTED]

8 [REDACTED]

9 [REDACTED]

10 [REDACTED]

11 Irrespective of whether or not Kinesso and Acxiom performed their data analysis

12 indirectly against the graph or directly against the Adstra data itself, it constitutes a

13 comparative analysis either way.<sup>71</sup>

14 65. Many technical documents that Adstra's counsel requested from Acxiom

15 have not been provided for my review, including access logs. A review of Amazon S3<sup>72</sup>

16 access logs would be expected to provide the date and time of requests and processes; the

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<sup>70</sup> See Ibid., attachment entitled "Adstra Removal Research," ACXIOM000719.

<sup>71</sup> Interviews of Reza Qorbani, Chief Technical Architect, October 10 and October 20, 2024. I understand that making a comparison against the graph indirectly as a truth set is a significant form of comparison just as making a comparison directly against Adstra data is a significant form of comparison.

<sup>72</sup> "Amazon S3 is a Simple Storage Service in AWS that stores files of different types like Photos, Audio, and Videos as Objects providing more scalability and security to. It allows the users to store and retrieve any amount of data at any point in time from anywhere on the web. It facilitates features such as extremely high availability, security, and simple connection to other AWS Services." See <https://www.geeksforgeeks.org/introduction-to-aws-simple-storage-service-aws-s3/>.

1 type of request made; the name of the S3 bucket that the request was processed for; the  
2 status of the request (e.g., success or error); the specific operation performed (e.g., object  
3 creation, retrieval, deletion; and other interactions with the Acxiom graphs which contain  
4 Adstra Data.);<sup>73</sup> I reserve the right to supplement this report upon receipt of said documents  
5 to provide greater certainty of Acxiom's testing of Adstra's data.

6 66. Additional documents that Adstra's counsel requested but have not been  
7 provided for my review include: Documents sufficient to reflect what tools and programs  
8 were used to extract, transform, and load the Adstra Data and the means by which Acxiom  
9 managed and reported such data; Documents sufficient to reflect what tools and programs  
10 were used to purge Adstra's Data from any build(s) of the Reference Graph, Kii, Real ID  
11 and/or Visitor Insights; production code releases for each event and Sprint planning  
12 releases associated with use and/or removal of the Adstra Data.<sup>74</sup> In addition to these  
13 documents I would hope to be able to conduct an inspection of Acxiom's systems which  
14 would help to provide further clarity on the issue of Acxiom's continued possession of  
15 Adstra data or the derivative benefit from Adstra's data.

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<sup>73</sup> See <https://docs.aws.amazon.com/AmazonS3/latest/userguide/using-s3-access-logs-to-identify-requests.html?form=MG0AV3>.

<sup>74</sup> See Proposed Order to Show Cause, October 11, 2024.